

RCRA INTERIM STATUS GROUND-WATER MONITORING  
INSPECTION REPORT

Pt A

INSPECTION OF:

Union Manufacturing Inc.  
6625 Wallison Road, P.O. Box 760  
Chandler, Arizona 85224  
EPA I.D. No. AZD088301213

TYPE OF FACILITY:

Surface Impoundment (Inactive) and  
Land Application of Liquid Waste

DATE:

July 23, 1982

PARTICIPANTS:

Bill Porter (U.S.E.P.A. Contractor)  
Richard W. Hafer (Factory Superintendent,  
Union Manufacturing, Inc.)

## OVERVIEW

This inspection report reviews Union Manufacturing's Compliance with the ground-water monitoring requirements of 40 CFR 265.90-265.94. Aspects of facility function relevant to ground-water monitoring are also discussed.

## FACILITY FUNCTION

The relevant hazardous waste operations at Union's Chandler plant consist of (1) a surface impoundment used for leach disposal of liquid chemicals used in a wash process, and (2) land application of wash from a paint stripping operation, used for leach and evaporation disposal.

Only the impoundment (D83) was listed on the Part A application dated 1-15-81, and the use of this pond has been discontinued. The date of discontinuance and the nature of the wastes discharged to the pond are uncertain, as this occurred prior to Mr. Hafer's employment at the site. In addition to the paint stripping wash, Mr. Hafer believes that phosphoric acid, chromic acid (in low concentrations), and perhaps other chemicals were received by the pond "several years ago", prior to the date of their application.

The wash from the paint stripping operation is currently spread onto the ground. Quantities are estimated to average less than one gallon per day, the operation being intermittent. The

active ingredient in the wash is an "alkaline soaker-cleaner" whose trade name is O/M #1; a material safety data sheet for this substance is included with this report. This substance is hazardous only due to corrosivity (high pH). Paints used at Union do not contain lead or other toxic substances.

Mr. Hafer states that Union received a letter dated 4-24-82 from the Arizona Department of Health Services requesting the completion of a "generator report." He attempted to contact Mr. Bill Williams of that agency by telephone to discuss what steps should be taken, since he does not believe the wash wastes to be hazardous due to their dilution. He was unable to reach Mr. Williams, and other personnel contacted at the department (names not recorded) could not advise him on his situation. The matter has not been pursued beyond this point, and no attempt has been made to withdraw the Part A application. As of this date, the wash wastes have not been analyzed.

#### COMPLIANCE WITH 40 CFR 265.90-265.94

There is no ground-water monitoring system at this site, and none is planned. Since the characteristics of the wash water have not been determined, and since their Part A application has not been corrected to indicate discontinuance of the pond and the current use of land application, their compliance status is uncertain. If the waste is determined to be hazardous, they should be able to demonstrate "small quantity generator" status, provided they dispose of the waste in accordance with 261.5(g).

**ATTACHMENTS:**

1. **Material Safety Data Sheet for Chemical  
Used in Stripping Operations**

**MATERIAL SAFETY DATA SHEET**Required under USDL Safety and Health Regulations for Ship Repairing,  
Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)**SECTION I**

MANUFACTURER'S NAME	DuBois Chemicals	EMERGENCY TELEPHONE NO.	(513) 769-4200
ADDRESS (Number, Street, City, State, and ZIP Code)	3630 East Kemper Road, Sharonville, OH 45241		
CHEMICAL NAME AND SYNONYMS	TRADE NAME AND SYNONYMS O/M #1		
CHEMICAL FAMILY	Alkaline soaker cleaner	FORMULA	

**SECTION II — HAZARDOUS INGREDIENTS**

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	TLV (Units)
Caustic alkali				43	2 mg/M

**SECTION III — PHYSICAL DATA**

BOILING POINT (°F.)	None	SPECIFIC GRAVITY (H <sub>2</sub> O = 1)	1.1 to 1.2
VAPOR PRESSURE (mm Hg.)	N/A	PERCENT. VOLATILE BY VOLUME (%)	0
VAPOR DENSITY (AIR = 1)	N/A	EVAPORATION RATE (n-butyl acetate = 1)	<1
SOLUBILITY IN WATER	20%		
APPEARANCE AND ODOR	Tan to brown powder; mild odor		

**SECTION IV — FIRE AND EXPLOSION HAZARD DATA**

FLASH POINT (Method used)	None	FLAMMABLE LIMITS	LeI	UeI
			None	None
EXTINGUISHING MEDIA	CO <sub>2</sub> , foam, dry chemicals			
SPECIAL FIRE FIGHTING PROCEDURES	None			
UNUSUAL FIRE AND EXPLOSION HAZARDS	None			